

**I am writing in opposition to HB 5469.**

This past January, like many of you, I attended the Forum on Student Data Privacy. It was made very clear by the presenters that the protection of this sensitive information is extremely complicated. That said, in order to protect CT students and families, CT needs a strong and comprehensive Data Statute.

HB 5469 fails to do just that – HB 5469 does NOT protect CT's most vulnerable – the children of CT.

MOST IMPORTANTLY this bill does NOT include a provision that a student and/or parent sign an "opt-in" consent form. The form must state what data is being collected and who or what entities will have access to giving permission ALL of a student's data.

Here are some of the other items this bill does NOT INCLUDE:

1. The preschool and college-age students who had been included in last year's bill. These students are still included in the statewide P20 WIN tracking system.
2. Uniform FERPA and SLDS notice to all parents when school year begins
3. Parental consent of student data disclosures to third parties (formerly in FERPA)
4. Parental notification of state agency contract involving student data
5. Parental inspecting, correcting, and removing data held/shared by schools (HB5469 Only covers "Operators" - parental rights should apply to all contracts)
6. Limit the sharing of sensitive personal and family information and strengthen protections of student medical data
7. Require posting of state and local data collection, sharing, and related contracts
8. Increase parent representation on P20 and other state and local data oversight boards
9. Educator notification and consent of data disclosures to contractors or other third parties
10. Protections from unreasonable search and seizure of personal electronic devices
11. Prohibit remotely accessible webcams on school issued devices
12. Ensure password privacy on student devices
13. Ensure security of school issued passwords
14. Incorporate COPPA into state law for students up to age 18.